

Nylin, Meghan

From: Nylin, Meghan
Sent: Tuesday, January 09, 2018 2:37 PM
To: Kelly Work; Kelly Work@14052323966
Cc: Klein, Marc H.; Rodgers, Sherri
Subject: Zhang v. Tiptop - Discovery Requests
Attachments: Tiptop - Second Requests for Production to Plaintiff.pdf; Tiptop - Second Set of Interrogatories to Plaintiff.pdf; Jayhawk Capital Management LLC v LSB Industries Inc.pdf; Yazzie v Law Offices of Farrell And Seldin.pdf

Counsel:

Attached please find Defendant's second set of interrogatories and second requests for production to Plaintiff Jidong Zhang. In addition, we request that Plaintiff provide dates in February for the deposition of Plaintiff's husband, Zhijie Zhao, as well as for the deposition of Plaintiff's expert, Dr. William M. Clark. Please also let us know if you have a preference for the location of those depositions.

Finally, we ask that Plaintiff produce documents responsive to Requests 58 and 59 from Defendant's first requests for production. I have attached case law indicating that agreements with attorneys are not privileged and should be produced when the producing party seeks recovery of attorney's fees. Billing statements should also be produced, although Tiptop does not object to the redaction of the portions of those bills, if any, that contain privileged information.

Sincerely,

Meghan Nylin
Thompson & Knight LLP
1722 Routh Street, Suite 1500
Dallas, Texas 75201-2533
Phone: (214) 969-1172
Fax: (214) 880-3133
meghan.nylin@tklaw.com

EXHIBIT 15